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Attorneys for Defendant
Evander Frank Kane

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

In re

EVANDER FRANK KANE,

Debtor.

HOPE PARKER

Plaintiff

v.

EVANDER FRANK KANE

Defendant

Case No. 21-50028-SLJ

Chapter 7

Adv. Proc. No. 21-5008

JOINT DISCOVERY PLAN

Status Conference: October 28, 2021

Time: 1:30 p.m.

Ctrlm: Tele/videoconference

Plaintiff, Hope Parker (“Parker”), and Defendant, Evander Kane (“Kane”), hereby file their joint discovery plan pursuant to the Court’s Order re Initial Disclosures and Discovery Conference (ECF #2). Parker and Kane are referred to herein as the “Parties”:

1. The Parties held a discovery conference on October 7, 2021, during which they discussed anticipated discovery in this case and the potential for resolution of matters.

JOINT DISCOVERY PLAN

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- 1 2. Because the Parties conducted discovery in the state court proceeding prior to
2 Kane's filing of his bankruptcy, the Parties agree to allow two months for Kane to
3 obtain the discovery from his state court counsel.
- 4 3. The Parties agree to exchange initial disclosures by December 19, 2021.
- 5 4. The Parties agree that any additional discovery may commence beginning
6 December 19, 2021.
- 7 5. Fact discovery cutoff:
- 8 a. The Parties agree to a fact discovery cutoff of April 29, 2022.
- 9 6. Expert discovery cutoff:
- 10 a. The Parties agree to that to the extent they determine that any experts are
11 required in this case, there will be an expert discovery cutoff date of June 17,
12 2022.

13 Currently, the Parties do not request entry of any orders under Fed. R. Bankr. P. 7016(b)
14 and (c) or 7026(a)(1).

15 Dated: October 15, 2021

FINESTONE HAYES LLP

17 /s/ Stephen D. Finestone

Stephen D. Finestone
Attorneys for Evander Kane

19 Dated: October 15, 2021

20 J. LEWIS & ASSOCIATES, APLC

22 /s/ Jonathan J. Lewis

Jonathan J. Lewis
Attorneys for Hope Parker